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7 *Attorney for Defendant Comcast Cable*
8 *Communications Management, LLC*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 ANNA DOUANGDARA,

12 Plaintiff,

13 v.

14 NATIONAL CONSUMER TELECOM &
15 UTILITIES EXCHANGE INC. AND
COMCAST CABLE COMMUNICATIONS
16 MANAGEMENT, LLC,

17 Defendants.

CASE NO. 2:22-cv-00852-JAD-BNW

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT
COMCAST CABLE COMMUNICATIONS
MANAGEMENT, LLC TO RESPOND TO
PLAINTIFF'S COMPLAINT**

(Second Request)

18
19 Plaintiff Anna Douangdara and Defendant Comcast Cable Communications
20 Management, LLC,¹ stipulate and agree that Comcast has up to and including August
21 5, 2022, to respond to Plaintiff's Complaint (ECF No. 1), to provide Comcast additional
22 time to investigate Plaintiff's allegations and for Comcast to prepare a response. The
23 current deadline to file a response is July 22, 2022. Therefore, this stipulation is
24 timely under LR IA 6-1.

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27 ¹ By filing this Stipulation, Comcast is not waiving any defense, affirmative or
28 otherwise, it may have in this matter, including, but not limited to, lack of personal
jurisdiction.

1 This is the second request for an extension of time for Comcast to respond to the
2 Complaint and is made in good faith and not for purposes of delay.

3 Dated: July 20, 2022.

4
5 BALLARD SPAHR LLP

FREEDOM LAW

6
7 By: /s/ Andrew S. Clark
Joel E. Tasca, Esq.
8 Nevada Bar No. 14124
Andrew S. Clark, Esq.
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1980 Festival Plaza Drive Suite 900
10 Las Vegas, Nevada 89135
Attorneys for Defendant Comcast Cable
11 *Communications Management, LLC*

By: /s Gerardo Avalos
Gerardo Avalos, Esq.
Nevada Bar No. 15171
8985 S. Eastern Ave., Suite 350
Las Vegas, Nevada 89123
Attorneys for Plaintiff

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18 **ORDER**

19 IT IS SO ORDERED:

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21 
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: July 21, 2022
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Crawford, Adam (LV)

From: Gerardo Avalos <gavalos@freedomlegalteam.com>
Sent: Tuesday, July 19, 2022 11:53 AM
To: Clark, Andrew S. (LV)
Cc: Michael Kind; George Haines; Tasca, Joel (LV)
Subject: RE: Douangdara v. NCTUE, 22-cv-00852

Follow Up Flag: Follow up
Flag Status: Flagged

△ EXTERNAL

Hi Andrew,

You are welcome to file with my signature.

Kind regards,

Gerardo Avalos, Esq.

Associate Attorney
Freedom Law Firm
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Las Vegas, NV 89123
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From: Clark, Andrew S. <clarkas@ballardspahr.com>
Sent: Tuesday, July 19, 2022 11:03 AM
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Cc: Michael Kind <mk@kindlaw.com>; George Haines <ghaines@freedomlegalteam.com>; Tasca, Joel <TASCA@ballardspahr.com>
Subject: RE: Douangdara v. NCTUE, 22-cv-00852

Thank you, Gerardo. Please find the attached stipulation to extend time. With your consent, we'll get this filed.

Andrew S. Clark

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From: Gerardo Avalos <gavalos@freedomlegalteam.com>
Sent: Monday, July 18, 2022 4:00 PM
To: Clark, Andrew S. (LV) <clarkas@ballardspahr.com>
Cc: Michael Kind <mk@kindlaw.com>; George Haines <ghaines@freedomlegalteam.com>; Tasca, Joel (LV) <TASCA@ballardspahr.com>
Subject: RE: Douangdara v. NCTUE, 22-cv-00852

⚠ EXTERNAL

Hi Andrew,

Yes we can agree to the extension, please send over a stipulation.

Kind regards,

Gerardo Avalos, Esq.

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